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August 8, 2020

VIA ECF

Honorable Joel Schneider
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 3C
4th and Cooper Streets
Camden, New Jersey 08101

Re: IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION
Civil No. 19-2875 (RBK/JS)

Dear Judge Schneider:

We write to correct the record in reply to Teva's letter responding to Plaintiff's letter with regard to Teva's proposed withdrawal of its ESI motion in order to avoid the Court's decision on the application.

Teva represents that it could not agree to Plaintiffs' position that Teva should provide Plaintiffs with the 5000 document audit sample proposed by Teva to evaluate the large number of documents Teva would label as likely unresponsive and not requiring review. That is inaccurate. Teva did agree to providing the 5000 document audit sample to Plaintiffs, but did not want the stipulation containing that provision to be filed on the ECF docket. Plaintiffs did not agree, and

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Teva withdrew its application rather than allowing this agreement to be memorialized on the docket.

Plaintiffs do not agree to other aspects of Teva's rendition, but trust that enough has been said on this distracting endeavor at this point.

Thank you for your courtesies and consideration.

Respectfully,
/s/Adam M. Slater
Adam M. Slater